



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I-NEW ENGLAND
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

URGENT MATTER - PROMPT REPLY NECESSARY
CERTIFIED MAIL - RETURN RECEIPT REQUESTED

JAN 13 2014

Mr. Edward Moreau, Facilities Manager
PTI Industries Inc.
2 Peerless Way
Enfield, CT 06082

Re: **NOTICE OF VIOLATION** of the applicable Generators Standards of Hazardous Waste, Section 3002 of the Resource Conservation and Recovery Act of 1976 (RCRA) and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6622(a) and 6924(d) through (m) and the Regulations of Connecticut State Agencies (RCSA):22a-449(c)-102 and 22a-449(c)-108.

Dear Mr. Moreau:

On October 30, 2013, representatives of the United States Environmental Protection Agency ("EPA") conducted a RCRA Compliance Evaluation Inspection. The purpose of this inspection was to determine the compliance of PTI Industries Inc., EPA ID No. CTR000504779 with Connecticut Hazardous Waste Regulations RCSA 22a-449(c)-102 and 22a-449(c)-108 and the federal Hazardous Waste Management Regulations found at 40 CFR Parts 260-272. The State of Connecticut has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection noted above, EPA has determined that your facility violated certain provisions of the Connecticut Hazardous Waste Regulations and the RCRA regulations, promulgated at 40 CFR Parts 260 through 272. The specific violations are set forth below:

1. **Failure to adequately label containers of hazardous waste with the words "Hazardous Waste" and a description of the contents, such as the chemical name, as required by 40 CFR 262.32 and RCSA 22a-449(c)-102(a)**

Specifically, the following containers were not labeled with the words "Hazardous Waste" and a description of the contents, such as the chemical name, in accordance with RCSA 22a-449(c)-102(a):

In the waste Water Treatment Room, there was one cubic-yard container, open and no label, containing F006 sludge. At the time of the inspection, the facility closed and labeled the container.

2. **Failure to meet the accumulation time limit for universal waste, as required by 40 CFR 273.15.**

Specifically, at the time of the inspection, in DFL Area, there was one 5-gallon container labeled, "Universal waste used batteries", dated, 7/12/2012. The date exceeded the one year accumulation limit for universal waste, in accordance with 40 CFR 273.15.

3. **Failure to label or mark containers of universal waste lamps with any of the following phrases: "Universal Waste - Lamp(s)", "Waste Lamp(s)", or "Used Lamp(s)", as required by 40 CFR 273.5 and RCSA 22a-449(c)113(a)(2)(c).**

Specifically, the following containers of universal waste lamps, located in the In the Maintenance Mezzanine, were not labeled with any of the following phrases: "Universal Waste - Lamp(s)", "Waste Lamp(s)", or "Used Lamp(s)", in accordance with RCSA 22a-449(c)113(a)(2)(c):

One 4-ft open container, with sixteen 4-ft. universal waste lamps, with no universal waste label and no date;

One 4-ft closed and taped container, labeled "bad bulbs" and no date;

One 4-ft open container, with eighteen 4-ft. universal waste lamps, labeled universal waste lamps and no date; and

One 3-ft open round cardboard container, labeled universal waste lamps and dated 12/12/12, with 5 u-shaped universal waste lamps, two 6-ft. universal waste lamps and six 4-ft. universal waste lamps, each lamp was in individual cardboard sleeves.

You are hereby required to:

1. Immediately upon receipt of this **NOTICE**:
 - a. Label all the 90-day accumulation containers with the words "Hazardous Waste" and the words that identify the contents, as required by RCSA 22a-449(c)-102(a).
 - b. Store universal waste batteries on-site for no longer than one year from the dated the universal waste is generated, or received from another handler, as required by 40 CFR 273.15.
 - c. Label all containers of universal waste lamps with any of the following phrases: "Universal Waste - Lamp(s)", "Waste Lamp(s)", "Used Lamp(s)", as required by RCSA 22a-449(c)-113(a)(2)(c).
2. Within (30) thirty calendar days of receipt of this **NOTICE**:

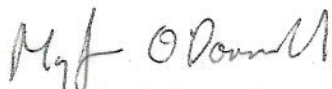
- a. Submit a written description, with supporting documentation, of the actions taken to correct the aforementioned violations to:

Linda Brolin, Environmental Engineer
U.S. Environmental Protection Agency
5 Post Office Square, Suite 1100
Mail Code: OES05-1
Boston, MA 02109

Failure to correct the violation as required by this **NOTICE** may subject the facility to further federal enforcement action, including the assessment of penalties, pursuant to Section 3008 of RCRA 42, U.S.C. § 6928.

If you have any questions regarding this **NOTICE**, please contact Linda Brolin, at (617) 918-1876.

Sincerely,



Mary Jane O'Donnell, Acting Manager
RCRA, EPCRA, and Federal Programs Unit

cc: Joseph Schiavone, CT DEEP

